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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Ernie Arthur Jaime,
Plaintiff,

v.

Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:21-cv-01672-SKO

STIPULATION AND ORDER FOR
SECOND EXTENSION OF TIME

(Doc. 13)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from July 25, 2022 to August 24, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. As Counsel has reported previously in many other cases in this district, Counsel for the Plaintiff underwent major orthopedic surgery on March 17, 2022. Although it has been over

1 three months, Counsel continues to work short periods throughout the day with
2 significant breaks throughout. Counsel continues to attend physical therapy four
3 days a week.

4 Additionally, for the weeks of July 25, 2022 and August 1, 2022, Counsel
5 for Plaintiff has seven merit briefs, and several reply briefs.

6 Defendant does not oppose the requested extension. Counsel apologizes to
7 the Defendant and Court for any inconvenience this may cause.

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9
10 Respectfully submitted,

11 Dated: June 27, 2022 PENA & BROMBERG, ATTORNEYS AT LAW
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13 By: /s/ Jonathan Omar Pena
14 JONATHAN OMAR PENA
15 Attorneys for Plaintiff
16

17 Dated: June 27, 2022 PHILLIP A. TALBERT
18 United States Attorney
19 PETER K. THOMPSON
20 Acting Regional Chief Counsel, Region IX
21 Social Security Administration
22

23 By: */s/ Margaret Lehrkind
24 Margaret Lehrkind
25 Special Assistant United States Attorney
26 Attorneys for Defendant
27 (*As authorized by email on June 27, 2022)
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ORDER

Based upon the foregoing stipulation of the parties (Doc. 13), and for good cause shown, Fed. R. Civ. P. 16(b)(4),

IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including August 24, 2022, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 9) shall be extended accordingly.

IT IS SO ORDERED.

Dated: **June 28, 2022**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE